

**UNITED STATES DISTRICT COURT**  
for the  
Eastern District of Michigan

United States of America

v.

Andre Darnell Louis

Case: 2:21-mj-30499

Assigned To : Unassigned

Assign. Date : 10/25/2021

Description: CMP: USA v LOUIS (MAW)

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 10/25/2021 in the county of Wayne in the  
Eastern District of Michigan, the defendant(s) violated:

*Code Section**Offense Description*

21 USC § 841(a)(1)

Possession with intent to distribute controlled substances

This criminal complaint is based on these facts:

See attached affidavit

☒ Continued on the attached sheet.


*Complainant's signature*

Special Agent Bradley Cioma

*Printed name and title*

Sworn to before me and signed in my presence  
and/or by reliable electronic means.

Date: October 25, 2021


*Judge's signature*

City and state: Detroit, MI

Elizabeth Stafford, U.S. Magistrate Judge

*Printed name and title*

**AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT**

I, Bradley Cioma, being first duly sworn, hereby depose and state as follows:

**Introduction and Agent Background**

1. I am a Special Agent with the FBI and have been since May of 2017. I am assigned currently to the FBI Detroit Division's Strike Force Group 1. Prior to working at the FBI, I was a police officer for six years in Plymouth Township, Michigan. I have participated in training related to and conducted dozens of investigations of federal and state violations, including crimes of violence, firearms, and drug trafficking.

2. The statements contained in this Affidavit are based on my experience as a special agent, information provided by police officers, other agents of the FBI, and other law enforcement personnel, communications with others who have personal knowledge of the events and circumstances described herein, and information gained through training and experience.

3. The information outlined below is provided for the limited purpose of establishing probable cause and does not contain all the information known to law enforcement related to this investigation.

### **Probable Cause**

4. I am currently investigating Andre Darnell LOUIS, date of birth xx/xx/1994, for violations of federal law, specifically, 21 U.S.C. § 841(a)(1), possession with intent to distribute controlled substances.

5. On October 25, 2021, Detectives from the Michigan State Police were observing the public areas of the Greyhound Bus Station in Detroit, Michigan. At approximately 12:45 pm a male was observed by Detectives being dropped off outside the Greyhound Bus Station on the western side of the building on Sixth Street. The entrance to the building is on the north side of the building on Howard Street and there was plenty of open parking spots to drop passengers off in front of the building. Additionally, it was raining outside. The male walked north and turned onto Howard Street and walked east bound towards the entrance to the Greyhound Bus Station. The vehicle that dropped the male passenger off, a Grey Chevrolet Impala with license plate DZC0049, then pulled from the west side of the building on Sixth Street and turned onto Howard Street traveling east and parked on Howard Street in front of the Greyhound Bus Station. The male passenger who was dropped off by this vehicle was observed to be wearing all black, with a black hoodie and white T-shirt visible at the bottom of the hoodie, wearing black pants and a tan military style backpack being carried on his back which was very unique and unlike any other luggage observed by Detectives the



entire day. The male passenger was then observed walking up to the Impala as it was parked in front of the Greyhound Bus Station, the front passenger of the Impala and the male passenger on foot were observed doing a hand-to-hand transfer of something. The male passenger in all black was then observed walking into the Greyhound Bus Station. The male was observed looking around, scanning the bus station. Detectives know from their training and experience this is a common behavior of individuals trafficking illegal narcotics, to look around and determine if law enforcement is present.

6. At approximately 12:45 pm passengers were boarding a bus that was headed from Detroit to the Southern part of the United States, set to depart at approximately 12:50 pm. The male wearing all black appeared to be entering the line for the passengers that were boarding the outbound bus. The bus was already boarding and the last-minute arrival increased Detectives suspicion as this is a common tactic used by narcotics traffickers to limit their time to be observed by law enforcement. Detectives were standing outside near the boarding bus and clearly visible to the male wearing all black. Detectives were in fully marked Michigan State Police attire. The male wearing all black wearing the tan backpack looked in the direction of the Detectives and was observed then walking around the interior of the bus station and appeared to be on his cell phone possibly texting. The male then exited the bus station and was observed by Detectives walking west

bound on Howard Street and then stood at the corner of Sixth Street and Howard Street and was observed looking at his phone and looking around, then started walking northbound on Sixth Street. The male was then observed looking back, possibly observing Detectives on surveillance and then he appeared to travel between buildings on the east side of Sixth Street a few hundred yards from Howard Street. Detectives then started to walk on foot between the buildings where the male was last observed. He was then observed by Detectives running westbound crossing Sixth Street, still wearing the tan, distinctive backpack on his person. Detectives traveled on foot in the last direction the male was observed. As Detectives were traveling westbound in the male's last known direction there was a church that Detectives passed and it was observed that a gate was open along the side of the church, which Detectives thought was unusual. Moments later another Detective observed the male running near the church. Another Detective then started traveling on foot near the area of the open gate to the church. The male wearing all black was observed running from that area eastbound down an alley towards the Lodge Freeway, and the subject was then observed hiding behind a dumpster at the end of the alley by the Lodge Freeway. Detectives continued running down the alley towards the dumpster, the male was then observed peaking over the dumpster. Then, after observing Detectives in clearly marked police uniforms, the male turned around and jumped a fence directly onto the freeway



embankment of the Lodge freeway. Detectives then observed the male running on the shoulder of the freeway. The previously-mentioned Chevrolet Impala, bearing license plate DZC0049, was then observed stopping on the shoulder of the freeway. The male loaded into the rear passenger door and the Impala started driving away and exited the freeway at Howard Street. The vehicle was then stopped by Detectives. The driver, front passenger and rear passenger were all detained. The rear passenger was later identified as Andre Darnell LOUIS.

7. Detectives then immediately traveled back to the open gate of the church where LOUIS was observed running nearby. Detectives checked three small garbage cans that were on the side of the church, located inside one of the garbage cans was the tan, very distinct backpack that LOUIS was observed wearing inside the Greyhound Bus Station. Detectives then stood by the garbage can and awaited a K9 officer who was also on scene. The K9 came out to the area of the garbage cans and Detectives did not tell the K9 handler where the tan backpack was. The dog worked the area of the alley and gave a positive indication on the garbage can where the tan distinct bag was located, knocking the garbage can over. The bag was then removed from the garbage can and the K9 gave a positive indication on the bag. A search was then conducted on the bag and located inside was a large amount of suspected Methamphetamine in three plastic bags. Also located in the alley where the suspected Methamphetamine was found, within

approximately 100 yards, was a black wallet with the Michigan Drivers license of LOUIS inside of it.

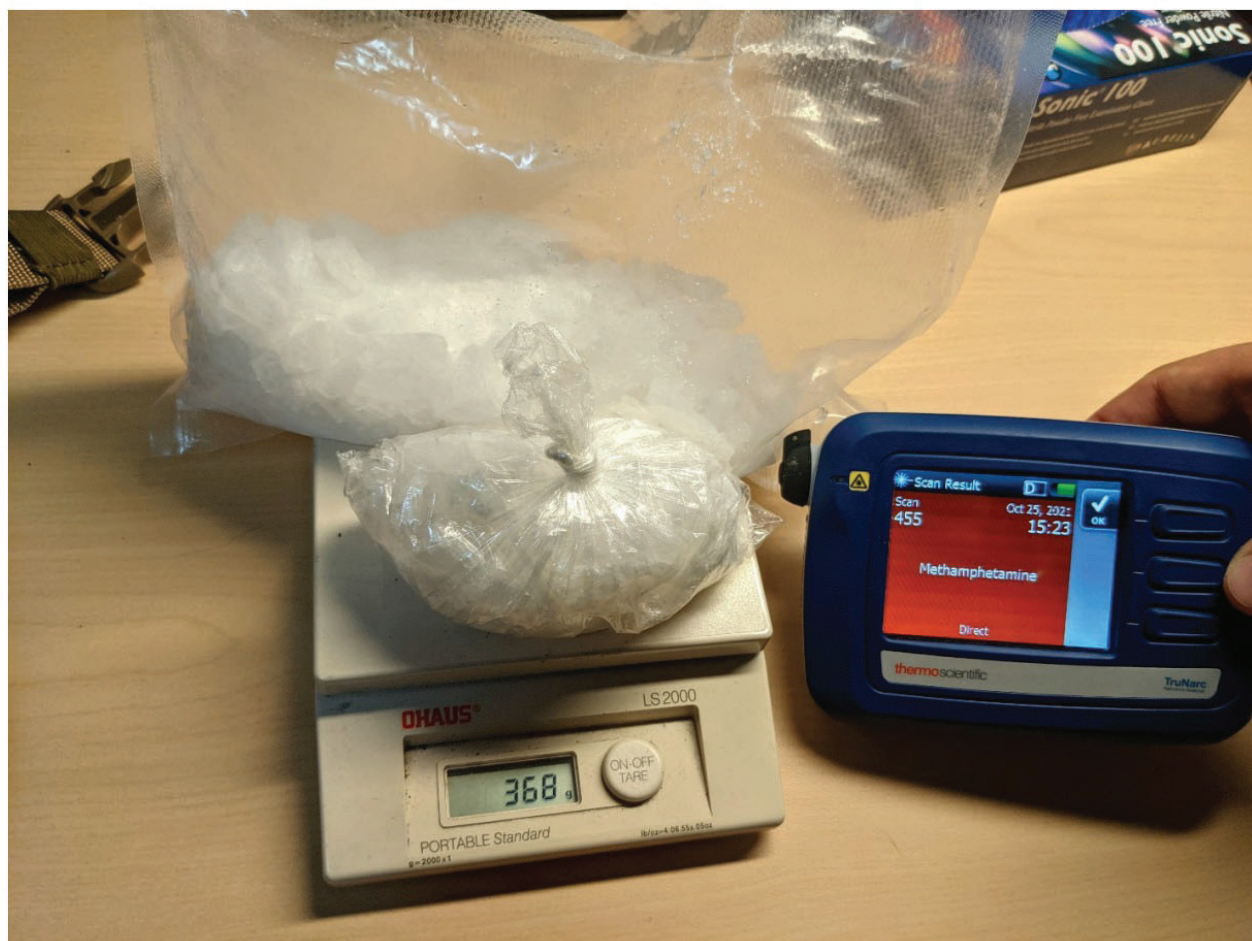
8. LOUIS was transported to the Michigan State Police Detroit Detachment and was interviewed by Michigan State Police Detective Chadwick Bloom. LOUIS was advised of his Miranda rights and consented to an audio recorded interview. During the interview he admitted to fleeing on foot because he knew the police were trying to contact him. LOUIS admitted to ditching the tan backpack he had on his person while inside the Greyhound Bus Station. He stated was going to travel to Virginia to visit his sister. He stated the other two guys in the Gray Impala did not have anything to do with what he was doing. LOUIS was asked if he lost anything, and he advised his wallet and phone. LOUIS was asked if he knew there was drugs inside the tan backpack, and he advised that he wanted a lawyer at this time.

9. A TruNarc Scan was done on the suspected illegal narcotics found in the tan backpack LOUIS had on his person while inside the Greyhound Bus Station and it tested positive for Methamphetamine. The Methamphetamine weighed approximately 835 grams and was in three separate plastic bags, all bags were tested and tested positive for Methamphetamine. In my training and experience, this amount of illegal narcotics is not consistent with personal use, and is instead consistent with narcotics trafficking.















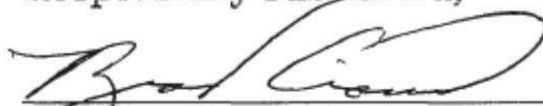
LOUIS has the following prior felony convictions:

- October 2016 – Felony – Drug Possess with intent sale/deliver controlled substance
- August 2017 – Felony – Drugs Trans Into Stat Cont Sub W/Int to Del

### **Conclusion**

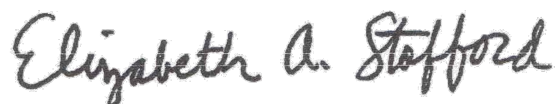
10. Based on the above information, probable cause exists to believe that Andre Darnell LOUIS, a previously convicted felon, violated 21 U.S.C. § 841(a)(1), Possession with Intent to Distribute Controlled Substances.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Brad Cioma', written over a horizontal line.

Bradley Cioma, Special Agent  
Federal Bureau of Investigation

Sworn to before me and signed in my presence  
and/or by reliable electronic means.

A handwritten signature in black ink, appearing to read 'Elizabeth A. Stafford', written over a horizontal line.

Honorable Elizabeth Stafford  
United States Magistrate Judge

Dated: October 25, 2021